

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

BRADLEY Y. SCHORR and)	
LORI A. SCHORR, Individually,)	
and on behalf of a class of similarly)	
situated persons,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action
)	File No.: 4:07-cv-19-WLS
COUNTRYWIDE HOME LOANS,)	
INC.,)	
)	
Defendant.)	

**Joint Request for Status Conference Regarding Procedures
and Timeline for Preliminary Approval of Class Action Settlement**

The parties respectfully request a brief status conference with the Court to obtain guidance before filing their motion for preliminary approval of the proposed settlement in this case. Specifically, the parties need to know whether the Court will grant plaintiffs’ consent motion for leave to amend this case to add Bank of America, N.A. (“BANA”) as a party defendant. Dkt. No. 142. BANA is the successor by merger and acquisition to the Countrywide entity that serviced the Schorrs’ mortgage and allegedly failed to cancel their security deed as required by O.C.G.A. § 44-14-3. BANA has consented to that amendment on the terms set forth in plaintiffs’ motion to amend. *Id.* at 2, n.1.

The parties have reached an agreement in principal to settle all of the class claims asserted in this case (*Schorr*) and those that were asserted in *Jones v. Bank of America Corp.*, No. 4:08-CV-00152-WLS, which was pending against BANA. If the Court allows the addition of BANA as a defendant in *Schorr*, the parties will submit a single motion in *Schorr* for

preliminary approval of a settlement that would resolve all claims of class members against Countrywide and/or BANA under O.C.G.A. § 44-14-3 in a single class with a uniform class period. That would also resolve the issue raised by the Court in the *Jones* matter as to whether it could consolidate or take any other action with respect to *Jones*, in light of the dismissal of that case as against the named plaintiffs only. *See* Dkt. # 88 in *Jones v. Bank of America Corp.*, No. 4:08-CV-00152-WLS.

Fundamental aspects of the preliminary approval papers depend upon whether the Court grants leave to amend. These include the proposed notices to be mailed and published, the claims form, the preliminary approval motion itself and the full and formal settlement agreement to be executed by the parties based upon their term sheet. Accordingly, the parties also respectfully ask leave to submit their preliminary approval papers within fourteen (14) days of the earlier of an order ruling on plaintiffs' motion to amend or the Court's indication at a status conference that it is inclined to grant this consent motion.

Respectfully submitted, this 23rd day of January, 2015.

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JOINT FILING CERTIFICATION

I, Charles A. Gower, certify that this document contains the signatures of all filers indicated herein and therefore represents consent for filing of this document.

This 23rd day of January, 2015.

s/ Charles A. Gower
Charles A. Gower
Georgia Bar No. 303500

CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed with the Clerk of the Court this **Joint Request for Status Conference Regarding Procedures and Timeline for Preliminary Approval of Class Action Settlement** using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

This 23rd day of January, 2015.

s/ Charles A. Gower
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